

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
WESTERN DIVISION**

JANE DOE #1, on behalf of herself and all  
others similarly situated,

Plaintiffs,

v.

MG FREESITES, LTD, d/b/a “PORNHUB”;  
MG FREESITES II LTD; MINDGEEK  
S.A.R.L.; MINDGEEK USA  
INCORPORATED; MG CY HOLDINGS  
LTD; MINDGEEK CONTENT RT LIMITED;  
9219-1568 QUEBEC, INC., d/b/a  
MINDGEEK; MG BILLING LTD,

Defendants.

CIVIL ACTION NO:  
7:21-cv-00220-RDP

Honorable Chief Judge R. David Proctor

**DEFENDANTS’ MOTION REQUESTING ORAL ARGUMENT TO ADDRESS  
BRIEFING REGARDING PROPOSED STRUCTURE FOR TRIAL AND OTHER  
PROCEEDINGS**

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*Counsel for Defendants MG Freesites Ltd,  
MG Freesites II, Ltd, MindGeek S.à r.l.,  
MindGeek USA Incorporated,  
MG CY Holdings Ltd, MG Content RT  
Limited, 9219-1568 Quebec Inc., and  
MG Billing Limited*

**COME NOW** Defendants MG Freesites Ltd, MG Freesites II, Ltd, MindGeek S.à r.l., MindGeek USA Incorporated, MG CY Holdings Ltd, MG Content RT Limited, 9219-1568 Quebec Inc., and MG Billing Limited (collectively, “Defendants”) and respectfully submit this motion requesting oral argument to address the parties’ Court-ordered briefing regarding the proposed structure for trial and other proceedings (the “Briefing”). *See* Docs. 277, 278, 281, 282. As grounds for this motion, Defendants state as follows:

1. At the direction of the Court, the parties recently filed the Briefing, which consisted of an initial brief by Plaintiff, a responsive brief by Defendants, a reply brief from Plaintiff, and a notice of supplemental authority from the Defendants. Docs. 277, 278, 281, 282. This Briefing is now pending before the Court.

2. The Briefing raises complex and nuanced matters relating to what issues are properly subject to trial in this matter, whether those issues may be tried, and, if so, the appropriate procedures to try each issue.

3. Oral argument will benefit the Court by providing an opportunity for the Court to present any outstanding questions to the parties. Oral argument will also further judicial economy by aiding the Court in making its determinations regarding the structure of a trial in this matter.

4. Accordingly, Defendants respectfully request that this Court issue an order scheduling oral argument on the Briefing.

5. Defendants welcome the opportunity to appear in Court in person should the Court see fit to grant this motion.

6. Counsel for Defendants have consulted with counsel for Plaintiff, who have indicated that they take no position on this Motion.

Respectfully submitted.

Dated: April 14, 2025

/s/ Kevin M. McGinty

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Dated: April 14, 2025

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**CERTIFICATE OF SERVICE**

I hereby certify on April 14, 2025, the document was filed through the Electronic Case Filing System of the United States District Court for the Northern District of Alabama and will be served electronically by the court to all participants of record.

/s/ Sara M. Turner

Sara M. Turner